



## HUD'S CONSOLIDATED PLAN

Office of Community Planning and Development

U.S. Department of Housing and Urban Development

---

### **An Action Guide for Involving Low-Income Communities: As it relates to HOPWA**

A city applicant for an EMSA (eligible metropolitan statistical area) must describe how the proposed activities will be used to meet the Urgent needs of persons with HIV/AIDS that are not being addressed by the public and private resources within the metropolitan area, and the public and private resources expected to be made available in connection with the proposed activities being funded, and the method of selecting project sponsors for activities in the metropolitan area including areas not within the boundaries of the applicant city.

*Identifying needs  
Setting Priorities  
Monitoring performance*

### **What is the Consolidated Plan?**

The Consolidated Plan requires a jurisdiction to identify all of its housing and community development needs, and then come up with a long-term strategy for meeting those needs.

*It's an application, for HOPWA Formula Funds!*

### **Why should CPD Reps be concerned about the Con-Plan?**

The simplest and most immediate reason for you to look at the Con-Plan process that all kinds of money (Federal, State, Local and Private) are tied to its proposals.

- Primarily benefits lower income people
- People with special needs; i.e.: elderly, frail elderly, persons with disabilities, persons living with HIV and/or AIDS.

### **What if low-income or special needs population do not get involved?**

- Low-income people could actually lose their homes due to displacement.
- Political pressures to use federal funds to substitute general revenue funds and not benefit low-income persons.
- People with housing needs may never be heard

### **Public Participation**

- *Real Public Participation is your responsibility too!*
- Getting people from the community involved
- Low-income people help build the con-plan
- What politicians want to do is not always what low-income people need or want!
- Beware of false public participation, i.e.: citizens advisory groups, who do they represent? Full range of needs populations?? Elderly, disabled, homeless, low-income etc.?

### **Good Citizens Participation is more than commenting on Plans!**

- Help keep residents informed, a detailed plan via effective citizens plan process

- 
- Large turn out to convince elected officials what residents really want!
  - Low-income persons should have officials responsible and accountable to them.

***The Citizens participation component should provide for:***

ACCESS TO INFORMATION  
ANTI-DISPLACEMENT OF PERSONS  
PROCESS FOR PUBLISHING INFORMATION  
DATES/TIMES OF PUBLIC HEARINGS  
NOTICE OF HEARINGS  
ACCESS TO MEETINGS COMMENTS RECEIVED  
AMMENDMENTS MADE TO THE PROPOSED PLAN  
PERFORMANCE REPORTS  
ACCESS TO RECORDS,  
TECHNICAL ASSISTANCE

(for citizens who request help in developing proposals for funding assistance covered by the plan) and  
COMPLAINTS.

---

**The Strategic plan to provide**

- Decent Housing, A suitable living environment, expand economic opportunities
- Prioritize needs analysis and strategies
- Specific objectives: Homeless needs, priority homeless needs, homeless strategy

---

**Special Populations**

- Needs of special populations,
- HIV/AIDS,
- Substance abuse treatment,
- Mental health facilities,
- Supportive housing etc.

---

**Action Plans**

- Source of funds
- Statement of objectives
- Description of projects
- Graphic distribution
- Monitoring (grantee of sub-recipients, sponsors, or sub-grantees)
- Results of past efforts

---

**HOPWA Formula Reviews under Consolidated Plans**

HUD staff must review plans under the Consolidated Planning regulation, 24 CFR part 91, with particular attention to the completeness of the grantee's submission of the HOPWA or HIV/AIDS-related elements of their plan for the recipients of HOPWA formula funds. HIV/AIDS issues are integrated throughout the qualitative review, especially in the "special needs populations" elements, in association with consultation of health and social service agencies, clients, local nonprofit organizations, and persons with disabilities, among others.

Based on program experience to date, the HOPWA activities are expected to be largely supportive housing activities that address the needs of persons who are not homeless; but HOPWA activities may also address needs of persons who are living with HIV/AIDS who are homeless and these activities should be presented in a coordinated manner with the associated elements that address the needs of persons who are homeless.

The following is provided as a reference tool. Under 24 CFR 91, the Consolidated Plan from a jurisdiction that receives HOPWA formula funds should clearly provide HIV/AIDS or HOPWA elements under each required component:

- (1) In consultations with other public and private agencies that provide assisted housing, health services and social services for persons with HIV/AIDS and their families;
- (2) In considering any comments or views expressed on HIV/AIDS housing and service needs by citizens under their citizen participation plan;
- (3) In estimating the number and type of family in need of housing assistance for persons with HIV/AIDS and their families under the housing and homeless needs assessment (including needs in their HOPWA service area, i.e. the size and characteristics of the population with HIV/AIDS in the entire eligible metropolitan statistical area (EMSA) for a city grantee, or, for a State grantee, the areas of the State that are outside of any EMSAs); in addition to Homeless needs, the plan's assessment of "other special needs" should include the number of persons with HIV/AIDS and their families who are not homeless but require supportive housing;
- (4) In providing a housing market analysis, including the supply, demand, condition and cost of housing and the housing stock available to serve persons with HIV/AIDS and their families; and
- (5) In providing a complete strategic plan, which addresses other special needs with components relative to persons with HIV/AIDS and their families who are not homeless but require supportive housing that:
  - (a) Indicate general priorities for allocating HOPWA program funds geographically within the eligible metropolitan statistical area and among priority needs;
  - (b) Describe the basis for assigning the priority given to each category of priority needs;
  - (c) Identify any obstacles to meeting underserved needs;
  - (d) Summarize the priorities and specific objectives, describing how funds made available will be used to address identified needs; and

- (e) For each specific objective, identify proposed accomplishments the jurisdiction hopes to achieve in quantitative terms over a specific time period (e.g. over two-five years), or in other measurable terms as identified and defined by the jurisdiction.

### **Corrections to Incomplete HOPWA Plans**

---

If aspects of the HOPWA elements of the plan are determined to be substantially incomplete, during the 45-day review period, grantees should be asked to provide supplemental information to ensure that the incomplete items are corrected. The Consolidated Plan procedures found at 24 CFR 91.500 on HUD approval action, must be followed. As provided in that regulation, if the HOPWA elements of a plan remain substantially incomplete, the HOPWA portion of a plan may be disapproved; in such case, the Field Office must provide the grantee with reasons for the disapproval and actions that could be taken to meet the criteria for approval. It is expected, that the jurisdiction would revise its plan accordingly, and resubmit a plan that could meet the established criteria.